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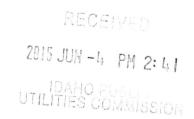
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Attorneys for Intervenor PIIC



## BEFORE THE IDAHO PUBLIC UTILITES COMMISSION

IN THE MATTER OF THE APPLICATION	)	Case No. PAC-E-15-09
OF ROCKY MOUNTAIN POWER TO	)	
MODIFY THE ENERGY COST	)	PETITION OF PACIFICORP IDAHO
ADJUSTMENT MECHANISM AND	)	INDUSTRIAL CUSTOMERS
INCREASE RATES BY \$10.2 MILLION,	)	FOR LEAVE TO INTERVENE
OR APPROXIMATELY 3.9 PERCENT	)	
	)	
	_)	

Pursuant to Rule 72 of the Idaho Public Utilities Commission's Rules of Practice and Procedure, IDAPA 31.01.01. 072 *et. seq.*, PacifiCorp Idaho Industrial Customers ("PIIC") petitions the Idaho Public Utilities Commission (the "Commission") for leave to intervene. In support of this Petition, PIIC states as follows:

1. The name and address of PIIC is:

PacifiCorp Idaho Industrial Customers c/o Jim Duke, President Idahoan Foods 357 Constitution Way Idaho Falls, ID 83742

2. PIIC will be represented in this proceeding by Williams Bradbury, P.C. All documents relating to these proceedings should be served on the following persons at the addresses listed:

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Val Steiner Agrium Us Inc.,/Nu-West Industries 3010 Conda Rd Soda Springs, ID, 83276-5301 E-mail: val.steiner@agrium.com

Jim Duke Idahoan Foods 357 Constitution Way Idaho Falls, ID 83742

E-mail: jduke@idahoan.com

Electronic service only is requested for both Mr. Steiner and Mr. Duke.

- 3. PIIC is a coalition of Idaho companies that are large load customers of Rocky Mountain Power ("RMP"). According to RMP's application in this proceeding, RMP is seeking an increase in base rates of \$10.2 million in Idaho, or 3.9 percent on average.
- 4. PIIC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. Without the opportunity to intervene herein, PIIC would be without a manner or means of participating in the determination of issues which could affect the rates for electric service to the PIIC members. PIIC's participation will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, PIIC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this  $4^{9^{-}}$  day of June, 2015.

Respectfully submitted,

Ronald L. Williams

Williams Bradbury, P.C.

Attorneys for PIIC

## CERTIFICATE OF DELIVERY

I HEREBY CERTIFY that on this \_\_\_\_\_\_\_ day of June, 2015, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

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Rocky Mountain Power

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Salt Lake City, UT 84111

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Ronald L. Williams

RM LWW